



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

OCTOBER 3, 2002

VIA FACSIMILE AND REGULAR MAIL

Mr. Jan Witold Baran
Attorney at Law
Wiley, Rein, & Fielding, LLP
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 5279

Dear Mr. Baran:

This Office received your consolidated response to the reason to believe findings against your clients. In your response, you state that the Commission "issued subpoenas to produce documents and orders to submit written answers to certain of the respondents. This response is intended to provide answers and documents responsive to most of those requests, which were based on incomplete and/or inaccurate information. To the extent additional information or responses are needed, respondents intend to provide them upon request." The response made legal arguments that this Office will evaluate; however, the response failed to provide the factual answers and documents requested by the Kushner subpoena. This Office requests a written response to each question and the production of the documents. In terms of priority, please concentrate on questions 8, 9, and 10 and items 4, 5, 6, 7, 8 of the request for production of documents.

Regarding the order for written answers and the subpoenas for Charles Kushner, Richard Stadtmauer, and Jeffrey Freireich, this Office also requests a full written response to the questions and the production of requested documents. Specifically, these respondents are to produce all bank records and statements reflecting debits for the making of political contributions and IRS Schedules K-1 (Form 1065) for tax year 1999.

Please respond with the information requested within 20 days of receipt of this letter. If you have any questions, please contact me or Michelle Abellera at (202) 694-1650.

Sincerely,

A handwritten signature in black ink, appearing to read "Albert R. Veldhuyzen".

Albert R. Veldhuyzen
Attorney